

EXHIBIT 2

062112KennethEade(Eade-InvestorsHub)ROUGH.doc

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3
4 KENNETH EADE,)
5 Plaintiff,)
6 v.) NO. CV11-01315
7 INVESTORSHUB.COM, INC., a) JAK (CWx)
8 Florida corp., DOE 1, aka NO)
9 DUMMY, DOE 2, aka JANICE)
10 SHELL, DOE 3, aka FASTER183,)
11 DOE 4, aka STOCK MAVIN, DOE 5,)
12 aka RENEE, DOE 6, aka VIRTUAL)
13 DREW, DOE 7, aka BOB 41,)
DOE 8, aka OVERACHIEVER,)
DOE 9, aka DOBERMAN, and)
DOE 10,)
Defendants.)

14
15 VOLUME I

17 Examination Under Oath of KENNETH EADE,
18 taken on behalf of Defendant
19 Investorshub.com, at 12400 Wilshire
20 Boulevard, Suite 400, Los Angeles,
21 California 90025, commencing at 10:07 a.m.,
22 Thursday, June 21, 2012, before Shana K.
23 Clifford, RPR, Certified Shorthand Reporter
24 No. 10154.
25

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KENNETH EADE - VOL I - UNEDITED TRANSCRIPT

1 APPEARANCES OF COUNSEL:
2 For Plaintiff:

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I N D E X

EXAMINEE	EXAMINED BY	PAGE
KENNETH EADE	MR. GOOD	

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8 EXHIBITS

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1 LOS ANGELES, CALIFORNIA; THURSDAY, JUNE 21, 2012

2 10:07 A.M.

3

4 (Pursuant to Federal Rule 30(b)(5), the

5 deposition officer made the following

6 statement:)

7

8 COURT REPORTER: My name is Shana Clifford

9 with Barkley Court Reporters, located at 1875 Century

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10 Park East, Suite 1300, Los Angeles, California.

11 Today is June 21, 2012, and it is now

12 10:07 a.m. We are taking this deposition at

13 12400 Wilshire Boulevard, Suite 400, Los Angeles,

14 California.

15 The examinee in this matter is Kenneth Eade.

16 Also present is Christopher Good.

17

18 (KENNETH EADE, examinee, was sworn,

19 examined, and testified as follows:)

20

21 COURT REPORTER: Raise your right hand. Do
22 you solemnly state that the testimony you are about to
23 give in this matter shall be the truth, the whole truth,
24 and nothing but the truth, so help you God?

25 MR. EADE: Yes.

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1 EXAMINATION

2 Q BY MR. GOOD: Good morning, Mr. Eade.

3 A Good morning.

4 Q You're here today -- you understand that you
5 are here today pursuant to the March 28th, 2012, court
6 order requiring your examination?

7 A Yes.

8 Q Okay. You also received a copy of a notice of
9 examination; is that correct?

10 A Yes.

11 Q Okay. Would you please review that for a
12 minute and make sure it's a copy of what was sent to
13 you.

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14 I'm going to lodge this as Exhibit 1.
15 (Exhibit 1 was marked for identification
16 and is attached hereto.)
17 THE THE EXAMINEE: It looks like it, yes.
18 Q BY MR. GOOD: Okay. And you understand, in
19 this notice of examination and request for production of
20 documents, that there were certain documents that you
21 were requested to produce?
22 A Yes.
23 Q And have you produced any of those documents
24 today?
25 A Yes.

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1 Q Okay. And how have you produced those
2 documents?
3 A I produced them by Internet download.
4 Q Okay. And those were the documents that we
5 were discussing off the record right before the
6 deposition that you produced this morning?
7 A Yes.
8 Q Okay. And do you have any other documents
9 outside of those documents to produce?
10 A No.
11 Q Okay. Before we go much farther, have you
12 ever had your deposition taken before?
13 A Yes.
14 Q Do you generally understand the rules of a
15 deposition?
16 A Yes.

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17 Q Okay. Can you explain?

18 A I didn't invoice them on those services at all
19 because I knew that they were only going to be able to
20 pay what they could pay. IFDC doesn't have any
21 revenues. So I did the lawsuit because I had to do it
22 to help IFDC. And I was lucky enough to get paid for
23 it. Mr. Cutler wasn't.

24 Q Okay. And do you have any idea how much they
25 presently owe him?

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1 A About \$15,000.

2 Q How do you know this information?

3 A Just from the chief executive officer, what he
4 says that he owes Cutler.

5 Q Okay. When was the last time you received any
6 stock from IFDC?

7 A In 2007 or '8.

8 Q Do you presently hold any stock in IFDC?

9 A Yes.

10 Q How much stock do you have of IFDC?

11 A I've got 600,000 shares, roughly. And my wife
12 has about 10 million shares, something like that.

13 Q For clarification, your present wife has
14 10 million shares?

15 A Yes.

16 Q How did your wife acquire 10 million shares of
17 IFDC?

18 A That's private.

19 Q When did your wife acquire 10 million shares
20 of IFDC?

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- 21 A Several months ago.
22 Q How many shares have you had of IFDC?
23 A Total of a little north of 13 million.
24 Q Did your wife receive those 10 million shares
25 from you?

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- 1 A Yes.
2 Q And she received those 10 million shares just
3 a few months ago?
4 A Yes.
5 Q Did your wife render services on behalf of
6 IFDC?
7 A No. Well, yes, but not for the 10 million
8 shares.
9 Q What services has your wife rendered for IFDC?
10 A PowerPoint presentations.
11 Q Were those services she rendered in helping
12 you prepare PowerPoint presentations?
13 A No. She worked for the company and prepared
14 PowerPoint presentations.
15 Q And who -- do you know whom she was hired by
16 at IFDC to prepare those presentations?
17 A At the time, it was me. But I'm no longer
18 with IFDC.
19 Q When did you terminate your relationship with
20 IFDC?
21 A In January of 2012.
22 Q So prior to January of 2012, your wife
23 prepared some PowerPoint presentations for IFDC?

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24 A Yes.

25 Q Did she perform any other services for IFDC?

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1 A No.

2 Q Was she compensated by IFDC for those
3 services?

4 A No.

5 Q And the 10 million shares has nothing to do
6 with compensating her for her services rendered to IFDC?

7 A No, it's completely private.

8 Q well, I -- we're going to have to broach this.
9 You transferred over 10 million shares within the last
10 couple months when you're indicating that you're
11 incapable of paying a \$49,000 debt. Is there -- I'm
12 entitled to know whether there's some legitimate reason
13 for the transfer of those shares.

14 A That's argumentative. The shares aren't worth
15 anything anyway.

16 Q There's no value to the shares?

17 A No, not that I know.

18 Q And you have no means of selling those shares?

19 A Nope.

20 Q Did your wife pay you to transfer the
21 10 million shares to her?

22 A No.

23 Q Did any money and/or any shares change hand
24 between you and your wife in exchange for her getting
25 the 10 million shares?

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1 A No.

2 Q Is there any business reason -- strike that.

3 was the transfer of the 10 million shares part
4 of any business transaction?

5 A No.

6 Q And can you be more specific as to when these
7 shares were transferred?

8 A Approximately three months ago.

9 Q was it before or after the court order of
10 March --

11 A I don't know.

12 If your client wants to take shares for
13 payment and the ones I have are not enough, I'm sure
14 that I can get my wife to sign over whatever you need.
15 I don't think your client would be interested in shares
16 they can't sell, but it's up to them.

17 Q what are the restrictions on the shares that
18 don't allow you to sell them?

19 A Affiliate restrictions.

20 Q And is there any time within which the
21 restrictions will lapse?

22 A If the stock becomes diluted to the point
23 where the holdings are under 10 percent, yes.

24 Q Do you know what percentage ownership you have
25 right now?

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1 A Including my wife's shares?

2 Q Yes.

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3 A Well, there's roughly 27 million shares total.
4 Q Outstanding for the corporation?
5 A Yeah. And if we have about 11, then --
6 Q That's 40 --
7 A And the other officer and director has about
8 11. It's -- between the two of -- two parties, they own
9 most of the company.
10 Q Okay. But there's no restrictions for you to
11 transfer those shares to another party?
12 A Privately, no. They're control shares.
13 Q And are there any restrictions on the private
14 sale of these shares?
15 A If you were to sell them?
16 Q Privately.
17 A No. If you were to sell them to someone else
18 privately, you could sell them, and they would retain
19 their restriction.
20 Q Have you made any effort to privately sell
21 these shares?
22 A No.
23 Q Why not?
24 A No reason. No buyers. No potential buyers.
25 Q Well, how do you know that if you haven't made

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1 any efforts to try to sell the shares?
2 A It would be a waste of time. From experience
3 I know that.
4 Q But you have not made any efforts to try to
5 solicit buyers of these shares?
6 A It would be futile. No, I haven't.

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7 Q And is it your understanding that these shares
8 are valueless?

9 A At the present time, yes.

10 Q Then I'm failing to understand why you
11 transferred those shares into your wife's name.

12 A Private marital affairs that I don't think we
13 need to discuss. Like I said, if your client wants to
14 get at them, I don't think it would be a problem. But I
15 don't think your client would be interested.

16 Q Where are the shares -- I will discuss that
17 with the client, and you can discuss with co-counsel
18 about that too. I will relay the offer.

19 A Well, it's not an offer. I mean, if they want
20 to execute on them, I don't think there's any doors that
21 would block the way.

22 Q All right. Where are these shares being held?

23 A In Russia. The certificate's in Russia.

24 Q In Blagovenschensk?

25 A Yes.

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1 Q Are these all the shares -- strike that.

2 Are all the shares that you and your wife own
3 held in Russia?

4 A Yes. There's -- with the exception of 200,000
5 shares in a brokerage account in -- in the Valley.

6 Q Which brokerage account?

7 A Glendale Securities.

8 Q Where -- strike that.

9 What branch of Glendale Securities?

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10 A There's only one.

11 Q Okay. And presumably it's in Glendale?

12 A In Sherman Oaks.

13 Q Okay. Do you have a specific broker?

14 A George Castillo.

15 Q And did you provide information regarding this
16 brokerage account in the documents that you sent over
17 this morning?

18 A No, I didn't.

19 Q Do you have documents that would be responsive
20 to the document production request regarding this
21 brokerage account?

22 A I probably have -- I had account statements,
23 but I threw them away because they were no -- of no
24 interest to me. So at the time of the production, I
25 didn't have anything. I might have opening account --

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1 an opening account form.

2 Q Okay.

3 A But I'm not sure. If you put it on your list,
4 I'd be happy to provide it.

5 Q And what about -- can you access that
6 account's information online?

7 A I think I can, but I've never done it, and I
8 don't know the password or the user code for -- there's
9 only those 200,000 shares in the account.

10 Q Are you provided with a monthly statement?

11 A Yes.

12 Q Is that a hard copy statement?

13 A Hard copy, yes.

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24 children?

25 A No.

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1 Q where do these children reside?

2 A One is in -- one is in Iowa, and one is in
3 San Fernando valley.

4 Q Do you have any contact with these children?

5 A The one in the San Fernando valley, yes.

6 Q And what's her name?

7 A Jillian.

8 Q what's her last name?

9 A Eade.

10 Q Do you have an address for Jillian?

11 A No.

12 Q Does she currently have any of your assets
13 and/or is holding any assets on your behalf?

14 A No.

15 Q Have you transferred any stock into her name?

16 A No.

17 Q Do the two of you have any joint bank accounts
18 together?

19 A No.

20 Q And I think you identified -- is it a she?

21 Iowa, is it also a daughter?

22 A Yes.

23 Q what's her name?

24 A Jennifer Keller.

25 Q And you're not in contact with her?

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- 1 A Unfortunately, no.
- 2 Q And I presume, therefore, you do not have any
- 3 joint accounts with Miss Keller?
- 4 A No.
- 5 Q She's not holding any assets on your behalf?
- 6 A No.
- 7 Q Have you transferred any stock into her name?
- 8 A No.
- 9 Q When was the last time you were in contact
- 10 with Miss Keller?
- 11 A Can you define what you mean by "contact"?
- 12 Q Called her, emailed?
- 13 A Facebook.
- 14 Q Okay.
- 15 A A month ago.
- 16 Q And what was the last time you were in contact
- 17 with Jillian Eade?
- 18 A Last night.
- 19 Q When did you arrive in town?
- 20 A Sunday.
- 21 Q You identified earlier that you moved into a
- 22 property in Paris that you are presently renting at
- 23 about the beginning of the year; is that right?
- 24 A Beginning of 2011.
- 25 Q 2011.

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- 1 A Yes.
- 2 Q Okay. There's also been identified in this

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3 litigation a property located near the border of Monaco
4 in France?

5 A Yes.

6 Q What is the status of that property?

7 A Can you be more specific on "status"?

8 Q Has the property been sold?

9 A No.

10 Q Wasn't the property supposed to have been
11 sold?

12 A Yes. It was ordered to be sold by the court
13 in Santa Monica.

14 Q Okay. And when was it ordered to be sold by?

15 A Okay. September 2010.

16 Q Okay. What is the continued holdup on the
17 sale of the property?

18 A My ex-wife.

19 Q And as you sit here today, it's your testimony
20 that the property has not been sold?

21 A Correct. It can't even be shown.

22 Q Why can it not be shown?

23 A She won't let anyone see it.

24 Q Is the property on the market?

25 A No.

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1 Q Is there a real estate agent associated with
2 the sale of the property?

3 A Yes and no.

4 Q Can you --

5 A Yeah --

6 Q -- explain?

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7 A -- I can explain.

8 During a time that she was mildly interested
9 in the U.S. court proceedings, the court ordered her to
10 sign listing agreements, and she did. Then she played
11 all kinds of games with the realtors. So there has been
12 a couple of real estate agents who haven't been able to
13 do anything because of her antics.

14 Q Okay.

15 A It's all in the court documents, and there's a
16 file 10 feet thick in Santa Monica.

17 Q Okay. And have you provided any of those
18 documents --

19 A Just the ones I attached to this. I didn't --
20 I didn't see anything in the papers that called for the
21 divorce documents, so I didn't --

22 Q Okay. But regarding the status of the
23 property.

24 A The title, yeah. I provided the title and the
25 lien that was requested in the document request.

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1 Q How much equity is in the property, do you
2 believe?

3 A I don't know because of the market now. I
4 have no idea.

5 Q Okay. Do you know how much --

6 A what it would sell for? Not really.

7 Q How much did you purchase the property for?

8 A For a little under 400,000 euros.

9 Q And I've seen one court document indicating a

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10 decrease in the sale price to 900,000?

11 A Yeah. It probably needs to decrease more.

12 Q Do you have any idea --

13 A Not really. Because of the economy in Europe
14 right now and the sliding euro, it's anybody's guess.

15 Q But upon the sale of the property, the
16 proceeds of -- strike that.

17 Upon the sale of the property, proceeds from
18 the sale will be split equally between you and your
19 ex-wife; is that correct?

20 A Theoretically.

21 Q Okay. Why theoretically and not in actuality?

22 A I expect there to be all kinds of claims and
23 accountings of things that she paid for that she thinks
24 should come back to her, that kind of thing.

25 Q Is she presently residing in the property?

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1 A Yes.

2 Q Is she paying any rent for the property?

3 A No.

4 Q Is she maintaining the mortgage for the
5 property?

6 A No.

7 Q Is the property in default right now?

8 A The property has been in default since 2009.

9 Q Have there been any foreclosure proceedings
10 brought against the property?

11 A Way back when, but I resolved everything with
12 the bank in 2009.

13 Q So what's the current status of the property

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14 as far as the bank is concerned?

15 A The current status of the property is that I
16 either need to get her out and put it up for sale or pay
17 off the bank by the end of the year.

18 Q And how much is owed to the bank?

19 A 75,000 euros.

20 Q So of the 400,000 that it cost to purchase the
21 property, only 75,000 is left remaining on the balance
22 owed?

23 A Yes.

24 Q So even if you sold it for what you bought it
25 for at 400,000, there's a profit to be split somehow

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1 right now of 325,000?

2 A Correct.

3 Q And you don't believe the market is anywhere
4 near that low?

5 A No. It's somewhere north of 400,000.

6 Q Can you give me an estimate? I mean, I
7 know --

8 A Yeah, it's --

9 Q If you can predict the real estate market in
10 this economy, more power to you. But is there any comps
11 for properties?

12 A There's some. I mean, it's an apartment with
13 two floors. It's a total of about 140 square meters,
14 1400 square feet. So there's -- you can see things for
15 400, 5-, 6-. I don't know if they're selling or not,
16 but those are just listing prices.

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10 Q And are you in possession of that car
11 presently?

12 A No.

13 Q Is your ex-wife in possession of that car?

14 A Yes.

15 (Interruption at door.)

16 MR. GOOD: Let's go off the record for a
17 minute.

18 (Off the record.)

19 MR. GOOD: Go back on the record.

20 Q So outside of the car in France being held by
21 your wife and the car that you utilize here that's in
22 your name in Agoura Hills, there are no other vehicles
23 that you own?

24 A Correct.

25 Q Does your wife own any vehicles?

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1 A No.

2 Q Do you use any vehicles while you're in
3 Russia?

4 A No.

5 Q And you don't use any vehicles in Paris?

6 A No.

7 Q I want to discuss any assets that you have
8 here in the United States.

9 Do you presently have any assets with value
10 over \$5,000 here in the United States?

11 A No.

12 Q What assets, if any, do you have any United
13 States?

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14 A None.

15 Q Is there any personal property that you
16 maintain at your mother's house?

17 A Some clothes.

18 Q Anything else outside of clothes?

19 A Golf clubs.

20 Q Anything else outside of golf clubs?

21 A No.

22 Q Do you have any memberships to any clubs here
23 in California?

24 A No.

25 Q Do you have any memberships to any clubs here

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1 in the United States?

2 A No.

3 Q Do you pay any members' do you see that on a
4 monthly basis?

5 A No.

6 Q So in essence your sole personal property is
7 the -- strike that.

8 In essence your sole personal property in the
9 United States consists of the Maserati lawsuit I,
10 clothes, and some golf clubs?

11 A Yes.

12 Q This is outside of obviously the bank accounts
13 that you maintain here?

14 A Yes. And the stock in IFDC.

15 Q Okay. And where is -- okay. That's at a
16 brokerage account?

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- 3 A Yes. In 2009 we were on good terms.
- 4 Q I want to go back to your declaration. You
- 5 indicate in your declaration on page 8, paragraph 6,
- 6 that you make approximately 11,000 per month.
- 7 A Yes.
- 8 Q Where is the source of this income?
- 9 A From the clients that pay me.
- 10 Q How many clients do you presently have?
- 11 A Oh, God, I don't know. It -- it varies from
- 12 month to month.
- 13 Q But you make approximately 11,000 per month?
- 14 That's still an accurate statement as far as you're
- 15 concerned?
- 16 A It's still an accurate statement, yes. You
- 17 know, it goes up. It goes down.
- 18 Q Are you still making payments in back taxes in
- 19 the amount of 2,500 per?
- 20 A Mm-hmm no right now I'm trying to do an offer
- 21 in compromise.
- 22 Q Are you paying anything right now?
- 23 A No. I'm -- I'm trying to see if they'll
- 24 accept my offer.
- 25 Q What is the offer that you're trying to get

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- 1 them to accept?
- 2 A \$20,000.
- 3 Q So you'd pay that in a lump sum?
- 4 A I've offered to, yeah.
- 5 Q How are you going to be able to pay that in a
- 6 lump sum?

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7 A Borrow it.

8 Q When was the last time you made a payment to
9 the IRS for back taxes owed in 2010?

10 A More than couple months ago. Probably around
11 the time I wrote the declaration.

12 Q So at the time you wrote the declaration you
13 were making payments of 2500 per month?

14 A Yes.

15 Q In back taxes?

16 A Correct.

17 Q And sometime shortly there after you stopped
18 making the payments at 2500?

19 A Yes when I was presented with the opportunity
20 to make an offer in compromise, I took it.

21 Q And how were you presented with the offer to
22 compromise?

23 A The revenue officer assigned to my case
24 suggested it.

25 Q Fine. Have you been discussing with anyone

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1 the potential of borrowing the \$20,000 in order to make
2 the payment?

3 A No, but I know I can get at least half of it
4 from my mom.

5 Q And would there be pay back terms associated
6 with that loan?

7 A Yes.

8 Q Do you have any idea what those terms would
9 be?

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21 aren't necessarily lining up with what you're bringing
22 in. Is that a fair estimation?

23 A I'm not sure I understand the question.

24 Q It seems like you're spending a lot more money
25 than you make?

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1 A I'm probably spending about the same as what I
2 make.

3 Q Okay.

4 A I'm not on a salary or a monthly basis. I do
5 everything by the week.

6 Q Okay.

7 A So whatever I make in the week, I'm -- the
8 bills are there, and I kind of juggle around who gets
9 paid what.

10 Q Presumably that will change in September with
11 the discontinuing of the payment for your wife?

12 A Yeah it will change but not significantly
13 because like I said, there's always something --
14 somebody to pay.

15 Q Including my client?

16 A Yes.

17 Q And what arrangements right now have you made
18 to pay my client?

19 A None: They made an offer to me that I
20 couldn't afford.

21 Q And is there any offer that you want to make
22 to them?

23 A I don't know. I haven't thought about it.

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24 They've been pretty adamant about wanting to get paid
25 the entire amount and right away. So I don't know. If

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1 they were as reasonable as the internal revenue service,
2 I might make a deal.

3 Q How did you get here today?

4 A I drove.

5 Q What did you drive?

6 A Some kind of a van/truck. Chevrolet -- a G.M.
7 C Tahoe or anything like that.

8 Q Is that a rental?

9 A No, it's a friend's car.

10 Q And when you go down to court in early July
11 for the hearing, will you be using that car or will you
12 be using the Maserati lawsuit I?

13 A Maserati lawsuit I.

14 Q If you'd please take a look over at the income
15 and expense declaration, is there any information that
16 you believe has changed since the time that you made
17 this declaration in late December 2011?

18 A The education and the internal revenue
19 service.

20 Q Okay.

21 A And those went down and car repairs went up.

22 Q Car repairs or for which car?

23 A Maserati.

24 Q You're paying more than 500 a month in
25 maintaining the Maserati?

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10 cents right now. The offer could go down.

11 Q Okay.

12 A Very easily. Someone could take out the bids
13 and the offer would go down to under 10 cents in two
14 days. One day.

15 Q And how long have you been trying to sell
16 these shares?

17 A I've had everything in place for about a
18 month. And I've been trying to sell them for the
19 past -- that period of time.

20 Q And are you aware if a single share of the
21 stock being sold in this last month?

22 A I'm aware that none has been sold of my
23 shares.

24 Q Okay. Are you aware of any shares being sold?

25 A Yes. There were some shares sold last week.

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□

1 They had 60,000 shares in volume, which means that
2 30,000 shares were sold and 30 throughout bought.

3 Q Okay. And do you know why your shares were
4 not a part of that sale?

5 A No but that's the way it goes. I'm hoping to
6 catch whatever sales -- a portion of whatever sales
7 happen.

8 Q And would you be agreeable to talking with my
9 client regarding using the proceeds from those sales in
10 order to pay off the outstanding balance owed to the
11 client?

12 A Sure we could talk about that. Or we could
13 talk about just giving them free trading shares.

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14 Q I thought the shares were holily restricted?

15 A They are, but I'm no -- I'm well, I'm still an
16 affiliate technically. I could transfer shares to your
17 client and they would have a holding period of six
18 months at which time they'd be able to sell all the
19 shares.

20 Q Okay. I think that's a discussion that you
21 can have with the client after the examination.

22 A Sure.

23 Q And it's true as of January 27th, 2012 you
24 resigned as CFO, chief compliance officer and secretary
25 of IFDC?

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KENNETH EADE - VOL I - UNEDITED TRANSCRIPT

1 A Correct.

2 Q You no longer have any business relationship
3 with IFDC outside of representing them in their current
4 litigation?

5 A Correct.

6 Q Are you general counsel for IFDC?

7 A No.

8 Q Does IFDC have general counsel?

9 A Yes.

10 Q who is general counsel?

11 A Richard Cutler.

12 Q Do you know how long Mr. Cutler has been
13 general counsel for IFDC?

14 A Since August of 2011.

15 Q At any time were you general counsel for
16 itches?

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17 A Yes.

18 Q When were you general counsel of IFDC?

19 A From the inception up until August of 2011.

20 Q It indicated in one of the documents -- strike
21 that.

22 It's indicated in one of the SEC filings that
23 you gifted approximately half a million shares of IFDC
24 in November of 2011.

25 A Correct.

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KENNETH EADE - VOL I - UNEDITED TRANSCRIPT

1 Q Who were those shares gifted to?

2 A Crisnic Fund.

3 Q Why were those shares gift today Crisnic Fund?

4 A To show my appreciation to Crisnic Fund and
5 Tony Gentile.

6 Q What were you showing them appreciation for?

7 A For being a good friend and a client.

8 Q Do you know what the value of the stock was at
9 the time that you gifted them the shares?

10 A No. The market value?

11 Q Yeah.

12 A No.

13 Q Would you be surprised if it was 50 cents
14 market value?

15 A No I wouldn't be surprised.

16 Q And were these -- strike that.

17 Are these freely trading shares?

18 A No they were restricted.

19 Q But considering the six months has past are
20 they unrestricted now as far as you know?

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21 Q You identify contract labor in your Schedule C
22 as \$55,000. What is that expense?

23 A Secretary.

24 Q If you're making income of \$104,256 and your
25 expenses for that business is \$104,079, how are you

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□

1 paying for your personal expenses?

2 A Well, there's a hundred thousand dollars that
3 was put in the slot of foreign earned income.

4 Q Where is that?

5 A Schedule 2555.

6 Q You have a qualified housing expense on
7 schedule 255 includes the payments that you're making
8 towards the property on the Monaco border?

9 A I don't think so. Let me look. No. It's
10 just the French --

11 Q The Paris?

12 A The Paris, mm-hmm. Not the Monaco.

13 Q I'll show you a document. If you could
14 describe what this is, we'll identify it as Exhibit 24.

15 (Exhibit N was marked for
16 identification and is attached hereto.)

17 THE EXAMINEE: It's a notice of levee from the
18 IRS. And it shows all the amounts that are my current
19 tax liabilities.

20 Q BY MR. GOOD: And what is your current tax
21 liability?

22 A \$196,329.

23 Q And who is eighth an wall pole?

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24 A He's the revenue officer.

25 Q Have you been in discussion was Mr. Wall pole?

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1 A Yes.

2 Q And is he the individual who is presently
3 seeking a work out with you?

4 A Yeah -- well, it's someone going to be -- it's
5 going to be in a different division, but he's the one
6 that suggested it.

7 Q He's the individual that the IRS trying to
8 facilitate the work out?

9 A No he's trying to be collect the taxes. He's
10 a ref officer he's trying to collect the taxes. There's
11 another person I haven't heard from yet who is in the
12 division that does the compromise, offers in compromise.

13 Q Okay. He's not willing to compromise?

14 A He's not -- it's not his position.

15 Q Is he not authorized to compromise?

16 A He's not authorized. He's just kind of the
17 orchestrate of the -- he's my point of contact. He's
18 the collector.

19 Q Okay.

20 Mark as Exhibit 25 another group of documents.

21 (Exhibit N was marked for
22 identification and is attached hereto.)
23 that you provided.

24 Q BY MR. GOOD: Please review them. Exhibit 24
25 the ones we just discussed those are documents that you

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1 provided?

2 A Yes.

3 Q And those are accurate copies of the documents
4 you sent to cocounsel and myself this morning?

5 A Correct.

6 Q Same with 25? Are those documents that you
7 provided to us?

8 A Yes.

9 Q And you're authenticating those documents?

10 A Yes.

11 Q And what are the documents that are
12 collectively referred to as Exhibit 25?

13 A The first -- first page is a fax cover page,
14 and the second page is his -- is Mr. Wall's cover letter
15 to me. The following page is what we talked about which
16 is filing certain documents including the offer in
17 compromise and then following that is a bunch of
18 printouts that shows by year what the IRS records of my
19 tax return -- what they figured -- what they corrected
20 all my mistakes and they figured out what they think I
21 owe.

22 Q Where did the tax issue originate from?

23 A Every time I file a tax return, they -- they
24 calculate that I owe more than I say, basically.

25 Q Okay.

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1 A So there's always a running deficit.

2 Q This is what I believe is the last group of

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3 documents you provided.

4 (Exhibit N was marked for
5 identification and is attached hereto.)

6 THE THE EXAMINEE: Yes.

7 Q BY MR. GOOD: Can you authenticate these
8 documents and identify what they are?

9 A Yes. Yes.

10 Q This is a duplicate of the letter and summary
11 of contact. And it should have -- let's make sure -- no
12 this looks like a duplicate of the entire -- it's a
13 duplicate of 24. There should be another pack with --
14 with a bunch of other printouts. Let's see: Wait a
15 minute. It's not a duplicate. Oh, boy. Okay. Let's
16 go --

17 Q why don't you take a minute, look through?

18 A Yeah.

19 Q 25 and 26 and then we'll go back on the record
20 and you can identify.

21 we're off the record.

22 (Off the record.)

23 MR. GOOD: we'll go back on the record.

24 Q Okay Mr. Eade with you of we just talked a
25 little informally about exhibits 25 and 26. And they

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□

1 appear to be a little bit of a mishmash of documents?

2 A Yes.

3 Q And we were trying to go through and decipher
4 it but for the sake of time is there kind of a general
5 difference to the documents that you understand?

6 A well, they're collectively all of my IRS tax

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7 records from 2002 through 2009.

8 Q Okay.

9 A They're the IRS records of my tax returns and
10 what they figure my taxes are for those years.

11 Q Okay. And they're just a little bit jumbled
12 up as far as you understand?

13 A Yeah something's not right about them on their
14 end.

15 Q Okay. Okay.

16 Now, is this to the best of your understanding
17 the documents that you?

18 A Yes.

19 Q Provided to us today?

20 A Yes.

21 Q And we've identified other documents,
22 specifically or most importantly your personal account
23 at Citibank that have not been provided yet correct?

24 A Correct.

25 Q And you are going to make efforts to get those

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KENNETH EADE - VOL I - UNEDITED TRANSCRIPT

1 documents as quickly as possible; is that correct?

2 A Yes.

3 Q Okay. And how will you go about getting those
4 records?

5 A I'll order -- if I don't have them in my
6 database --

7 Q Uh-huh?

8 A -- which I thought I had be given them to you,
9 which means I probably don't have them in my database,

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10 I'll order them online.

11 Q Okay.

12 A And in a few business days they'll pop up in
13 my online bank account access, and I'll download them
14 and send them over to you.

15 Q Okay. And there's also more records that you
16 have regarding the Maserati that you're going to look
17 for?

18 A Just the registration.

19 Q Okay.

20 A That's it.

21 Q But you don't have any records outside of your
22 bankruptcy filing regarding the value of the Maserati or
23 the amount of lien?

24 A The amount of lien now. The value would have
25 to be set by appraisal because there's no blue book on

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□

1 Maserati.

2 Q You said it's roughly \$96,000?

3 A Correct.

4 Q What type of Maserati is it?

5 A It's a Cambriocorsa, C-a-m-b-r-i-o-c-o-r-s-a.

6 Q What color is it?

7 A Gray.

8 Q You said it was 2002?

9 A Yes.

10 Q And did you purchase it in 2002?

11 A No 2005.

12 Q Okay. So you purchased it used?

13 A Yes.

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14 Q And do you know how much you purchased it for?

15 A About 60,000.

16 Q 60?

17 A 60.

18 Q Do you know how much those cars are worth when
19 they're knew?

20 A Back in 2002, it was probably a little short
21 of a hundred thousand.

22 Q And how many miles were on it when you bought
23 it?

24 A 10,000.

25 Q So you put some good miles on it?

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□

1 A No, I didn't.

2 Q Okay. Who put some good miles on it?

3 A My exassistant who was taking care of it.

4 Q Okay.

5 A He decided he wanted to live in Idaho and I
6 got a call once from the sheriff in Oregon that my car
7 was impounded.

8 Q So your exassistant had stolen the car?

9 A Essentially, yes. He embezzled the car.

10 Q Okay. I'd like to go back through the notice
11 of the examination that was sent and served on you.

12 A Okay.

13 Q And as we indicated before, I still want to
14 review those documents. There's other documents that
15 you're going to provide so we'll schedule a continuing
16 of the examination at some point agreeable to the

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7 Q Okay.
8 A Can't from memory.
9 Q Do you know were they more than five years
10 ago?
11 A Probably, yes.
12 Q Do you receive judgments in those matters?
13 A The only one I can remember I got a judgment,
14 yes.
15 Q Okay. And were you paid on that judgment?
16 A No it wasn't a money judgment.
17 Q What type of judgment was it?
18 A To get stock back.
19 Q And you received those stock back?
20 A Probably not.
21 Q Okay. Have you renewed that judgment?
22 A No. It wouldn't -- it wouldn't be any good to
23 renew.
24 Q Okay. Why --
25 A It's a she will company that would cost more

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KENNETH EADE - VOL I - UNEDITED TRANSCRIPT

□

1 to resurrect than -- than to sell.
2 Q What is the amount of the judgment?
3 A It was just getting shares back.
4 Q What were the number of shares?
5 A I don't remember. It was a controlling block
6 of shares.
7 Q Okay. Do you have documents regarding that
8 matter?
9 A Yeah probably.

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10 Q Okay. Would you provide those documents?
11 A Sure.
12 Q All documents evidencing accounts maybe
13 contained by you with credit unions?
14 A None.
15 Q All documents -- and do you have any accounts
16 with a credit union?
17 A No.
18 Q Okay. Are you owed any money from a state
19 city county or federal government agency?
20 A No I owe them.
21 Q Okay. You've identified that you have a court
22 judgment for shares. Do you know what the name of the
23 company was so I can give a reference?
24 A Left bid.
25 Q LEFTBID?

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□

1 A Uh-huh, yes.
2 Q Do you own any copyrights trademarks or
3 patents?
4 A No.
5 Q And do you presently own any assets with value
6 over \$500?
7 A My watch. But I don't have any documents on
8 it. It was a gift.
9 Q Okay. Any other items?
10 A No.
11 Q And are third parties holding any assets on
12 your behalf?
13 A No.

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24 in Independent Film Development Corporation.

25 A Yeah I gave you the shareholder list on that.

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1 Q All documents evidencing shares of Independent
2 Film Development Corporation gifted by you.

3 A The shareholder list as well. That was the
4 only thing.

5 Q And you have no documents regarding the
6 transfer of the shares?

7 A No.

8 Q To your wife?

9 A No.

10 Q Were those gifted?

11 A Yes.

12 Q Have you provided all documents you think
13 responsive showing your ownership in either Kennata or
14 Gold Standard Mining Corporation?

15 A Correct.

16 Q And you presently have no ownership interest
17 or involvement with either Kennata or Gold Standard
18 Mining Corporation?

19 A Correct.

20 MR. GOOD: Okay let's go off the record for a
21 minute.

22 (Off the record.)

23 MR. GOOD: Back on the record. Mr. Eade, we
24 talked briefly off the record for a minute regarding the
25 finishing up the examination today. As you are aware,

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1 there are still documents and information that have yet
2 to be disclosed, and you have agreed to provide that
3 information be; is that correct.

4 THE DEPONENT: Yes.

5 Q I will provide provide you a list shortly
6 within the next few days of additional documents that we
7 are seeking. Is that understood?

8 A Yes.

9 Q And you agree to try to get responsive
10 documents as soon as possible?

11 A Yes.

12 Q Is that --

13 A Yes.

14 Q At a date within the next few weeks
15 contemplated the middle of the month of July, presumably
16 we will continue this debtor's examination at a date and
17 time mutually agreeable to the parties?

18 A Can we say within the month of July because I
19 have a pretty tight schedule and I'm going to give you
20 ranges of times.

21 Q We'll try to be agreeable to your schedule.
22 we'll work -- try to work a mutually agreeable day for
23 the parties.

24 A Okay.

25 Q So you understand that the examination is not

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KENNETH EADE - VOL I - UNEDITED TRANSCRIPT

1 concluded; is that correct?

2 A Yes.

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3 Q okay. And that you are still under -- or
4 bound by the order of the court to go under your
5 examination is that understood?

6 A Yes.

7 Q If the parties are not able to find a date to
8 continue the examination, it is understood that -- and
9 agreed that we may proceed ex parte to order the court
10 to set a date for the continuing examination?

11 A Yes.

12 Q And you agree to that?

13 A Yes.

14 Q And we will provide you ex parte notice per
15 the code?

16 A Okay.

17 Q Or do you remember -- I mean, we'll most
18 likely be telling you beforehand. That con clues of
19 clues the examination for the day?

20 A Okay.

21 MR. GOOD: Thank you very much.

22

23

24

25

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